

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

KIM MCALLISTER,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

No. C11-5053 RJB

STIPULATED MOTION AND ORDER  
TO EXTEND DEADLINES

Noted for consideration: November 16, 2011

The parties hereby respectfully request that the Court extend various deadlines associated with the above captioned case. While the parties have been diligently working to complete discovery, it has been difficult to schedule the depositions of several key witnesses due to their necessary work on behalf of the Forest Service. Many of the Forest Service employees spend significant time in the field, which complicates the scheduling of depositions. Furthermore, Plaintiff recently took the 30(b)(6) deposition of the Forest Service which resulted in a request for three depositions of Forest Service employees. Plaintiff has also requested electronic communications of a number of Forest Service employees, which require extensive searching of electronic communication. The gathering, processing, and reviewing of such data is time intensive. The United States' production of documents pursuant to Plaintiff's request is ongoing and includes electronic communications of a number of Forest Service employees. Plaintiff has

1 appropriately requested the production of such data prior to deposition of the remaining  
2 witnesses requested by Plaintiff as a result of the 30(b)(6) deposition. For these reasons, the  
3 parties respectfully request that the current deadlines be extended as indicated below.

4 **STIPULATION**

5 WHEREAS, the parties jointly request that the deadlines set forth in the Court's  
6 April 11, 2011 Order may be amended as set forth below:

7       Discovery:                       December 22, 2011  
8       Dispositive Motions:       January 27, 2012  
9       Mediation:                     February 10, 2012  
10      Trial Date:                    May 14, 2012, at 9:30 a.m.  
11      Pretrial Conference       May 4, 2012, at 8:30 a.m.

12 NOW THEREFORE, the parties, through their respective counsel of record, do hereby  
13 jointly request that the Court may make and enter an order amending pretrial dates as set forth  
14 above.

15  
16 **SO STIPULATED.**

17 DATED this 16th day of November, JENNY A. DURKAN  
18 2011. United States Attorney

19 /s/Kayla C. Stahman  
20 KAYLA C. STAHPMAN, CABA # 228931  
21 Assistant United States Attorney  
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28 Attorneys for the United States America

1 **SO STIPULATED.**

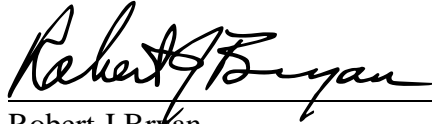
2 DATED this 16th day of November,  
3 2011.

/s/Ryan C. Nute  
RYAN C. NUTE  
Michael D. Myers  
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10  
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12  
13 **ORDER**

14 **IT IS SO ORDERED.**

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16 DATED this 18th day of November, 2011.

17  
18   
19 Robert J Bryan  
20 United States District Judge  
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